

1 BROOKS R. BROWN (SBN 250724)
bbrown@goodwinprocter.com
2 **GOODWIN PROCTER LLP**
10250 Constellation Blvd.
3 Los Angeles, California 90067
Tel.: 310.788.5100
4 Fax: 310.286.0992

5 ROBERT B. BADER (SBN 233165)
rbader@goodwinprocter.com
6 **GOODWIN PROCTER LLP**
Three Embarcadero Center, 24th Floor
7 San Francisco, California 94111
Tel.: 415.733.6000
8 Fax: 415.677.9041

9 Attorneys for Defendants: *Countrywide Home*
Loans, Inc. and *Countrywide Bank, FSB*
10

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN JOSE DIVISION**

14 ENEIDA AMPARAN, RAFAEL CISNEROS
15 and GUADALUPE CISNEROS, individually
and on behalf of all others similarly situated,

16 Plaintiffs,

17 v.

18 PLAZA HOME MORTGAGE, INC.;
19 WASHINGTON MUTUAL MORTGAGE
SECURITIES CORP.; WAMU ASSET
20 ACCEPTANCE CORP.; COUNTRYWIDE
HOME LOANS, INC.; COUNTRYWIDE
21 BANK, FSB; and DOES 5 through 10
inclusive,

22 Defendants.
23

Case No. 5:07-CV-04498-JF (RSx)

**JOINT STIPULATION TO RESCHEDULE
CASE MANAGEMENT CONFERENCE**

Current date: December 3, 2010

Proposed date: December 17, 2010

Time: 10:30 a.m.

Courtroom: Courtroom 3, 5th Floor

Judge: Hon. Jeremy Fogel

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 6-1(a), plaintiffs Eneida Amparan, Rafael Cisneros and Guadalupe Cisneros (“Plaintiffs”), and defendants named as “Plaza Home Mortgage, Inc.” (“Plaza Home”), “Washington Mutual Mortgage Securities Corp.” (“WMMSC”), “WAMU Asset Acceptance Corp.” (“WAAC”), “Countrywide Home Loans, Inc.” (“CHL”), and “Countrywide Bank, FSB” (“Countrywide Bank”) (the “Countrywide Defendants”) (collectively, the “Defendants”) (together, with Plaintiffs, the “Parties”), through their undersigned counsel, stipulate as follows:

WHEREAS, by Order dated October 1, 2010 (“CMC Order”), this Court scheduled a further case management conference in this matter for December 3, 2010 (the “CMC”) (Dkt. No. 166));

WHEREAS, Plaintiffs’ counsel and the Countrywide Defendants’ counsel in this action are also counsel of record in the *Romero v. Countrywide Bank, N.A.*, No. C-07-04491 JF RS (N.D. Cal.) (“*Romero*”) action pending before this Court;

WHEREAS, a hearing on the Countrywide Defendants’ motion to dismiss in *Romero* is scheduled for December 17, 2010;

WHEREAS, under these circumstances and in order to conserve this Court’s and the Parties’ resources by coordination of their respective appearances before this Court in this action and *Romero* on a single date (*see* Fed. R. Civ. P. 1 (Rules shall be construed “to secure the just, speedy and inexpensive determination of every action”)), the Parties agree, subject to the approval of this Court, that a two-week continuance of the CMC to December 17, 2010 – the same date as the motion to dismiss hearing in *Romero* – is appropriate;

WHEREAS, Plaza Home, WMMSC, and WAAC agree to this brief continuance;

WHEREAS, no Party will be prejudiced by the relief requested in this Stipulation; and

WHEREAS, this Stipulation is without prejudice to, or waiver of, any rights or defenses otherwise available to the Parties in this action;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between Plaintiffs, by their undersigned counsel, and Defendants, by their undersigned counsel, that, subject the

1 approval of this Court, the Case Management Conference set for December 3, 2010 shall be
2 continued to December 17, 2010 at 10:30 a.m..

3
4 Respectfully submitted.

5 Dated: November 23, 2010

By: /S/ Robert B. Bader

BROOKS R. BROWN

bbrown@goodwinprocter.com

GOODWIN PROCTER LLP

10250 Constellation Blvd.

Los Angeles, California 90067

Tel.: 310.788.5100

Fax: 310.286.0992

ROBERT B. BADER

rbader@goodwinprocter.com

GOODWIN PROCTER LLP

Three Embarcadero Center, 24th Floor

San Francisco, California 94111

Tel.: 415.733.6000

Fax: 415.677.9041

Attorneys for Defendants: *Countrywide Home
Loans, Inc.* and *Countrywide Bank, FSB*

15 ///

1 Dated: November 23, 2010

By: /s/ Lee A. Weiss
LEE A. WEISS (admitted *pro hac vice*)
lweiss@bwgfirm.com
BROWNE WOODS GEORGE LLP
1 Liberty Plaza, Suite 2329
New York, NY 10006
Tel. 212.354.4901
Fax. 212.354.4904

DAVID M. ARBOGAST
darbogast@law111.com
JEFFREY K. BERNIS
jberns@law111.com
ARBOGAST & BERNIS LLP
6303 Owensmouth Avenue, 10th Floor
Woodland Hills, CA 91367-2263
Tel. 818.961.2000
Fax. 818.936.0232

MICHAEL A. BOWSE
mbowse@bwgfirm.com
BROWNE WOODS GEORGE LLP
2121 Avenue of the Stars, Suite 2400
Los Angeles, CA 90067
Tel. 310.274.7100
Fax. 310.275.5697

CHRISTOPHER A. SEEGER
cseeger@seegerweiss.com
SEEGER WEISS LLP
One William Street
New York, NY 10004
Tel. 212.584.0700
Fax: 212.584.0799

JONATHAN SHUB
jshub@seegerweiss.com
SEEGER WEISS LLP
1515 Market Street, Suite 1380
Philadelphia, PA 19107
Tel. 215.564.2300
Fax. 215.851.8029

JENNIE ANDERSON
jennie@andrusanderson.com
ANDRUS ANDERSON, LLP
155 Montgomery Street, 9th Floor
San Francisco, CA 94104
Tel. 415.986.1400
Fax. 415.986.1474

Counsel for Plaintiffs: *Eneida Amparan;*
Rafael Cisneros and Guadalupe Cisneros

1 Dated: November 23, 2010

By: /S/ John D. Alessio

JOHN D. ALESSIO

jda@procopio.com

**PROCOPIO CORY HARGREAVES &
SAVITCH, LLP**

530 B Street, Suite 2100

San Diego, CA 92101-4469

Tel. 619.238.1900

Fax. 619.235..398

Counsel for Defendant: *Plaza Home Mortgage,
Inc.*

8 Dated: November 23, 2010

By: /S/ Stephen Ryan Meinertzhagen

ROBERT S. BEALL

rbeall@sheppardmullin.com

SHANNON Z. PETERSEN

spetersen@sheppardmullin.com

**SHEPPARD MULLIN RICHTER &
HAMPTON LLP**

650 Town Center Drive, 4th Floor

Costa Mesa, CA 92626

Tel. 714.513.5100

Fax. 714.513.5130

LEANN PEDERSEN POPE

lpope@burkelaw.com

STEPHEN RYAN MEINERTZHAGEN

smeinertzhagen@burkelaw.com

**BURKE WARREN MACKAY &
SERRITELLA, P.C.**

330 North Wabash, 22nd Floor

Chicago, IL 60611

Tel. 312.840.7013

Fax. 312.840.7047

Counsel for Defendant: *Washington Mutual
Mortgage Securities Corp. and WAMU Asset
Acceptance Corp.*

ECF CERTIFICATION

Pursuant to General Order No. 45, § X.B., the filing attorney attests that he has obtained concurrence regarding the filing of this document from the signatories to the document.

Dated: November 23, 2010

GOODWIN PROCTER LLP

By: /s/ Robert B. Bader

*Attorneys for Defendants: Countrywide Home
Loans, Inc. and Countrywide Bank, FSB*

PROOF OF SERVICE

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on November 23, 2010.

/s/ Robert B. Bader
Robert B. Bader